

Hearing Date and Time: February 23, 2016 at 10:00 AM (Prevailing Eastern Time)  
Objection Date and Time: February 16, 2016 at 4:00 PM (Prevailing Eastern Time)

**BROWN RUDNICK LLP**

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*Counsel to ASR Levensverzekering N.V.,  
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Levensverzekering Maatschappij*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL FOR  
ASR LEVENSVERZEKERING, N.V., FALCON LEVEN N.V., AND  
N.V. AMERSFOORTSE LEVENSVERZEKERING MAATSCHAPPIJ**

**PLEASE TAKE NOTICE** that a hearing on the Motion to Withdraw as Counsel for ASR Levensverzekering N.V., Falcon Leven N.V., and N.V. Amersfoortse Levensverzekering Maatschappij (the “Motion”) filed by Brown Rudnick LLP will be held before the Honorable Shelley C. Chapman of the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”) on **February 23, 2016 at 10:00 AM (Prevailing Eastern Time)** (the “Hearing”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objection party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (which can be

found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy hand delivered directly to the Chambers of the Honorable Shelley C. Chapman at the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, One Bowling Green, New York, New York 10004), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and any objections must further be served upon (i) attorneys for LBHI, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Garrett A. Fail, Esq., and Melissa Siegel, Esq.) and (ii) the Office of the United States Trustee for Region 2, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan Golden, Esq., and Andrea B.Schwartz, Esq.); so as to be so filed and received by no later than **February 16, 2016 at 4:00 PM (Prevailing Eastern Time)** (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: January 20, 2016  
New York, New York

**BROWN RUDNICK LLP**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11</b>
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<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	<b>Case No. 08-13555 (SCC)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
-----		<b>X</b>

**MOTION TO WITHDRAW AS COUNSEL FOR ASR  
LEVENSVZERZEKERING, N.V., FALCON LEVEN N.V., AND  
N.V. AMERSFOORTSE LEVENSVZERZEKERING MAATSCHAPPIJ**

Pursuant to Rule 2090-1(e) of the Local Rules of the Bankruptcy Court for the Southern District of New York (the “Local Rules”), Brown Rudnick LLP (“Brown Rudnick”) respectfully seeks to withdraw as counsel for ASR Levensverzekering N.V. (“ASR”), Falcon Leven N.V. (“Falcon”), and N.V. Amersfoortse Levensverzekering Maatschappij (“N.V. Amersfoortse,” and collectively with ASR and Falcon, the “ASR Entities”), in the above-captioned bankruptcy proceeding and states as follows:

1. The ASR Entities have instructed Brown Rudnick to immediately cease providing any further legal services to, and to conclude its representation of, the ASR Entities in the proceeding, without any substitution of counsel.

2. Based on the foregoing, good cause exists to permit Brown Rudnick to withdraw as counsel of record under Local Rule 2090-1(e).

**WHEREFORE**, Brown Rudnick respectfully requests that the Court enter an order in the form attached hereto as Exhibit A.

Dated: January 20, 2016  
New York, New York

**BROWN RUDNICK LLP**

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